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Attorneys for Defendant
THE BANK OF NEW YORK MELLON
CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re BANK OF NEW YORK MELLON
CORPORATION FALSE CLAIMS ACT
FOREIGN EXCHANGE LITIGATION, *Ex rel.*
FX ANALYTICS,

Plaintiff,

v.

THE BANK OF NEW YORK MELLON
CORPORATION, and DOES 1 through 100,
inclusive,

Defendants.

No. 3:11-cv-05683-JCS

STIPULATION EXTENDING TIME TO
RESPOND TO SECOND AMENDED
COMPLAINT

Pursuant to Civil Local Rule 6-1(a), the undersigned parties hereby stipulate and agree to extend the time within which Defendant may plead, move or otherwise respond to the Second Amended Complaint as follows:

1. On or before December 27, 2011, the Plaintiff/Relator and the Intervenors (collectively, "Plaintiffs") may: (1) move to remand this action to state court in whole or in part, (2) file a further amended complaint(s), or (3) take none of these actions.

2. If Plaintiffs neither move to remand nor file a further amended complaint, Defendant shall have until January 23, 2012 to plead, move or otherwise respond to the Second Amended Complaint currently on file in this action.

3. If Plaintiffs move to remand, Defendant shall have until January 23, 2012 to oppose such motion.

4. If a motion to remand is made and denied, Plaintiffs may amend the present complaint within 15 days of the Court's ruling denying the motion to remand. If no Plaintiff elects to amend, Defendant shall plead, move, or otherwise respond to the Second Amended Complaint currently on file within 45 days of the Court's ruling denying the motion to remand.

5. If any Plaintiff files an amended complaint rather than seeking remand, Defendant shall have 30 days from the filing and service of such amended complaint in which to plead, move or otherwise respond to it. The briefing schedule on any such motion shall be in accordance with the Local Civil Rules for the Northern District of California.

Dated: December 13, 2011

BINGHAM McCUTCHEN LLP

By: /s/ David M. Balabanian
David M. Balabanian (SBN 37368)
Attorneys for Defendant The Bank of
New York Mellon Corporation

1 Dated: December 13, 2011

LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

2
3 By: /s/ Lexi Hazam

Lexi Hazam (SBN 224457)

4 Attorneys for Plaintiff/Relator FX Analytics

5 Dated: December 13, 2011

COTCHETT, PITRE & McCARTHY, LLP

6
7 By: /s/ Steven N. Williams

Steven N. Williams (SBN 175849)

8 Attorneys for Intervenors Los Angeles County

Employees Retirement Agency, San Diego

9 County Employee Retirement Association, Los

Angeles Department of Water and Power

10 Retirement Plan, and Stanislaus County

Employees Retirement Agency

11
12
13 Dated: Dec. 14, 2011

